

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
ST. LOUIS DIVISION

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|--|---|-------------------------------|
| SARAH J. BRASHEAR, <i>Individually</i> |) | |
| <i>and on behalf of all others similarly</i> |) | Case No.: 4:22-cv-00569-SRC |
| <i>situated,</i> |) | |
| |) | JURY TRIAL DEMANDED |
| Plaintiff, |) | |
| |) | COLLECTIVE ACTION PURSUANT TO |
| vs. |) | 29 U.S.C. § 216(B) |
| |) | |
| SSM HEALTH CARE CORPORATION, |) | CLASS ACTION PURSUANT TO FED. |
| |) | R. CIV. P. 23 |
| Defendant. |) | |
| |) | |

DEFENDANT SSM HEALTH CARE CORPORATION'S
CONSENT MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

COMES NOW Defendant SSM Health Care Corporation ("Defendant"), by and through undersigned counsel, and hereby moves for an extension of time to answer or otherwise respond to Plaintiff Sarah J. Brashear's ("Plaintiff") Complaint, showing the Court as follows:

1. Plaintiff filed her Complaint on May 24, 2022 [ECF #1].
2. Defendant was served with a civil summons and Plaintiff's Complaint on May 26, 2022 [ECF #4].
3. Defendant's current deadline to answer or otherwise respond to Plaintiff's Complaint is on or before Thursday, June 16, 2022.
4. In order for Defendant's counsel to fully investigate and respond to Plaintiff's Complaint, Defendant respectfully requests a two-week extension through and including Thursday, June 30, 2022, to answer or otherwise respond to Plaintiff's Complaint.

5. Counsel for Defendant conferred with Plaintiff's counsel who has indicated that Plaintiff does ***not*** oppose Defendant's request for a two-week extension and consents to the requested extension.

6. Pursuant to the Honorable Stephen R. Clark's Requirements, the Court has not yet issued its Case Management Order ("CMO") for this case; therefore any extension of time should not impact any future deadlines contained in the CMO.

7. Further, and pursuant to the United States District Court for the Eastern District of Missouri's Local Rules, Section 4.01, Defendant will not file a separate memorandum in support of its motion for extension of time.

8. This is Defendant's first request for an extension of time to answer or otherwise respond to Plaintiff's Complaint and this request is not being made for purposes of delay or any other vexatious purpose.

WHEREFORE, Defendant respectfully moves this Court to extend the deadline for Defendant to respond to Plaintiff's Complaint (by answer, motion, or otherwise) through and including Thursday, June 30, 2022.

Dated: June 14, 2022

Respectfully submitted,

DOWD BENNETT LLP

By: /s/ James G. Martin

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Attorney for SSM Health Care Corporation

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ James G. Martin